


Case Clip(s) Detailed Report
 Tuesday, November 10, 2009, 5:56:25 PM

Fair Isaac v Experian et al

 **Tantia, Piyush (Vol. 01) - 05/30/2008**

1 CLIP (RUNNING 00:11:05.234)

 Would you tell us your full name? ...

TANTIA **27 SEGMENTS (RUNNING 00:11:05.234)**



1. PAGE 5:18 TO 6:05 (RUNNING 00:00:24.800)

18 Q. Would you tell us your full name?
 19 A. Piyush Tantia.
 20 Q. Mr. Tantia, what's your city and state
 21 of residence?
 22 A. New York City, New York.
 23 Q. And by whom are you employed?
 24 A. Oliver Wyman.
 25 Q. What educational degrees do you have,
 00006:01
 02 Mr. Tantia?
 03 A. I have a bachelor's of science in
 04 computer science and a bachelor's of science in
 05 economics.

2. PAGE 6:22 TO 7:03 (RUNNING 00:00:16.300)

22 Q. Mercer Oliver Wyman was a consultant
 23 for Equifax, Experian, and TransUnion during the
 24 second half of 2005, wasn't it?
 25 A. Yes.
 00007:01
 02 Q. And you played a role in that work that
 03 Mercer Oliver Wyman did; correct?

3. PAGE 7:05 TO 7:05 (RUNNING 00:00:01.434)

05 A. Yes.

4. PAGE 7:11 TO 7:17 (RUNNING 00:00:21.700)

11 Q. Yes. The work that Mercer Oliver Wyman
 12 did for the credit bureaus, do you recall it
 13 starting in about June of 2005?
 14 A. Yeah, I think it was June or July when
 15 we started the project.
 16 Q. And when did you consider the project
 17 finished from Mercer Oliver Wyman's perspective?

5. PAGE 7:19 TO 7:25 (RUNNING 00:00:31.266)

19 A. I believe we -- we officially ended
 20 either end of October or sometime in November, and
 21 there was a final meeting I think middle of
 22 November.
 23 Q. Is it your recollection, then, that the
 24 role of Mercer Oliver Wyman was officially done
 25 following this final meeting in mid-November 2005?

6. PAGE 8:03 TO 8:08 (RUNNING 00:00:15.766)

03 A. Yeah.
 04 Q. And is it fair to say that for this
 05 work that Mercer Oliver Wyman did it was paid
 06 approximately \$800,000 in fees by the credit
 07 bureaus?
 08 A. Yeah, that sounds right.

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7. PAGE 9:06 TO 9:20 (RUNNING 00:01:03.200)

06 Q. What did you understand Mercer Oliver
 07 Wyman's role to be for the credit bureaus?
 08 A. We were asked to do a few things:
 09 broadly, help manage the project, but within that
 10 our role was documenting the process, facilitating
 11 the project and any meetings, helping prepare
 12 communication materials for project-related
 13 meetings, and just dealing with logistics like
 14 getting computers, getting the space set up,
 15 et cetera.
 16 Q. What was your personal role?
 17 A. My role was what we call an execution
 18 partner role. So I was responsible for the
 19 day-to-day oversight of the project and just
 20 dealing with day-to-day client contact as well.

8. PAGE 21:19 TO 21:22 (RUNNING 00:00:08.933)

19 Q. What do you recall Mercer Oliver Wyman,
 20 either through you or through Peter Carroll,
 21 telling the group about your qualifications at
 22 that meeting?

9. PAGE 21:24 TO 22:12 (RUNNING 00:00:45.833)

24 A. Let's see. It's a long time ago. But
 25 I believe Peter talked about our past experiences
 00022:01
 02 helping clients build credit scores and models.
 03 He talked about the fact that we work with a lot
 04 of the clients who buy credit scores, both generic
 05 and custom. I remember talking about projects
 06 I've done in the past where I myself was building
 07 credit scoring models for clients and decisioning
 08 models, et cetera.
 09 Q. So Mercer Oliver Wyman and indeed you
 10 personally had been involved previously in
 11 building credit scores and doing modeling for
 12 credit scores; correct?

10. PAGE 22:15 TO 22:16 (RUNNING 00:00:05.534)

15 A. Yes, we've been involved in building
 16 credit scores and models for clients.

11. PAGE 76:07 TO 76:13 (RUNNING 00:00:18.733)

07 (Plaintiff's Exhibit 149, MOW document,
 08 marked for identification, as of this date.)
 09 Q. Mr. Tania, welcome back. We took a
 10 short break there. I'm handing you what's been
 11 marked as Plaintiff's Exhibit 149.
 12 Did Mercer Oliver Wyman prepare this
 13 document?

12. PAGE 76:25 TO 77:07 (RUNNING 00:00:13.967)

25 A. Could you repeat the question? I was
 00077:01
 02 reading the document.
 03 Q. That's fine. You've had a moment now
 04 to review Exhibit 149, Mr. Tania?
 05 A. Yes.
 06 Q. Did Mercer Oliver Wyman prepare that
 07 document?

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13. PAGE 77:09 TO 77:21 (RUNNING 00:00:35.900)

09 A. Yeah, I believe so, yes.
 10 Q. Would you have been personally involved
 11 in preparing that document?
 12 A. Yes.
 13 Q. This is from a July 12, 2000, meeting;
 14 correct?
 15 A. I can't tell specifically from the
 16 document, but that would be my best guess, judging
 17 from the content, yes.
 18 Q. And that's what we've been referring to
 19 in this deposition as the kickoff meeting;
 20 correct?
 21 A. Yes.

14. PAGE 95:21 TO 96:03 (RUNNING 00:00:24.967)

21 Q. Would you turn to page 3592, sir. At
 22 the top of that page it says, "Output will be a
 23 probability, but it can be scaled to anything
 24 using the translation table to enhance usability."
 25 Do you see that language?
 00096:01
 02 A. Yes, I see the language.
 03 Q. What do you understand that to mean?

15. PAGE 96:07 TO 96:12 (RUNNING 00:00:17.434)

07 A. I believe it means that the raw of
 08 point of any credit score is a probability of
 09 delinquency and that it can be represented with
 10 any sort of scaling, you know, different numbers,
 11 multiplied by a hundred, whatever, things like
 12 that.

16. PAGE 254:12 TO 254:13 (RUNNING 00:00:07.934)

12 Q. Would you please turn to page 494914,
 13 and that's internal page 41 in Exhibit 42.

17. PAGE 255:21 TO 256:08 (RUNNING 00:00:30.000)

21 Q. And there's a reference to the scoring
 22 range being chosen to be 501 to 990; correct?
 23 A. Yes.
 24 Q. It says several issues were raised
 25 which led to these choices being made. Do you see
 00256:01
 02 that reference?
 03 A. Yes, I see it.
 04 Q. And the first one is "easier adoption
 05 and implementation if score scale is similar to
 06 others in the market." Do you see that?
 07 A. Yes.
 08 Q. What does that mean?

18. PAGE 256:14 TO 256:18 (RUNNING 00:00:19.700)

14 A. I think it means that this score range
 15 would be easier for customers to adopt and
 16 implement than other options and other
 17 distribution options like probabilistic and
 18 normal.

19. PAGE 263:05 TO 263:24 (RUNNING 00:01:41.433)

05 (Plaintiff's Exhibit 164, proposal re
 06 tribureau scorecard dated 3/21/05, marked for
 07 identification, as of this date.)

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08 Q. I've handed you what's been marked as
09 Exhibit 164. Do you see that that is, just by its
10 title, sir, a proposal to help the three major
11 U.S. credit bureaus develop a tribureau scorecard
12 dated March 31, 2005, just by its title?
13 A. Let me just flip through this.
14 (Pause.)
15 A. I'm sorry, your question again was?
16 Q. Yes. Exhibit 164 is a proposal dated
17 March 31, 2005, to help the three major U.S.
18 credit bureaus develop a tribureau scorecard;
19 correct?
20 A. No.
21 Q. That's what it's entitled; correct?
22 A. The first page says that, yes.
23 Q. And do you recognize the handwriting on
24 this document?

20. PAGE 264:03 TO 264:14 (RUNNING 00:00:39.833)

03 Q. On the first page, Exhibit 164?
04 A. Yes, I recognize the handwriting on the
05 first page.
06 Q. Whose is it?
07 A. It's Peter Carroll's.
08 Q. Do you recall there being a meeting
09 where Exhibit 164 was discussed with the credit
10 bureaus at which you and Peter Carroll were
11 present?
12 A. The proposal was discussed at a meeting
13 with the credit bureaus where Peter Carroll and I
14 were present, yes.

21. PAGE 265:08 TO 265:11 (RUNNING 00:00:14.666)

08 I'm handing you what's been marked
09 previously as Plaintiff's Exhibit 38. Do you see
10 this is dated June 15, 2005, Project Trident, and
11 it's on Mercer Oliver Wyman paper?

22. PAGE 265:13 TO 265:19 (RUNNING 00:00:18.700)

13 A. Yes, I see that it says Mercer Oliver
14 Wyman.
15 Q. Is this a document that you helped put
16 together?
17 A. The best of my recollection, I made
18 some minor edits to this document.
19 Q. Who was the principal author?

23. PAGE 265:23 TO 266:06 (RUNNING 00:00:18.500)

23 A. I believe Peter Carroll was the
24 principal author.
25 Q. Would you turn to page 521, production
00266:01
02 number 521. It's internal page number 2.
03 A. Okay.
04 Q. It says on the top: calibrate to FICO.
05 Do you see that reference?
06 A. Yes.

24. PAGE 266:08 TO 266:16 (RUNNING 00:00:35.734)

08 (Plaintiff's Exhibit 165, MOW document
09 dated 6/15/05 called Project Trident, marked
10 for identification, as of this date.)
11 Q. I'm handing you what's been marked
12 Exhibit 165. Do you see that this is again a

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13 Mercer Oliver Wyman document dated June 15, 2005,
14 called Project Trident?
15 (Pause.)
16 A. Yes.

25. PAGE 266:22 TO 266:24 (RUNNING 00:00:12.900)

22 Q. Do you see that the heading has been
23 changed to "calibrate to customer need" instead of
24 "calibrate to FICO"?

26. PAGE 267:04 TO 267:09 (RUNNING 00:00:19.367)

04 A. I can see that the heading is
05 different. I don't know which version comes
06 before the other.
07 Q. Do you see that this heading says
08 "calibrate to customer need." It doesn't say
09 "calibrate to FICO," does it?

27. PAGE 267:13 TO 267:13 (RUNNING 00:00:00.700)

13 A. That's right.

TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:11:05.234)